

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 04 CR 10314 RCL
)	
(1) MANUEL E. PINALES,)	
(2) JOSE ANTONIO CRUZ,)	
a/k/a "Eduardo LNU")	
(3) LUIS R. CLAS,)	
a/k/a "Cuba")	
(4) RICHARD PENA, and)	
(5) TAJH M. WHITE)	
_____)	

GOVERNMENT'S MOTION TO EXCLUDE TIME FROM JUNE 6, 2005
THROUGH AND INCLUDING AUGUST 26, 2005 AS TO MANUEL PINALES
AND FROM JUNE 6, 2005 THROUGH AND INCLUDING JULY 27, 2005
AS TO ALL OTHER DEFENDANTS

The United States, with the assent of defendant Pinales, respectfully moves to exclude, in computing the time within which the trial of this matter shall commence under 18 U.S.C.

§3161(c)(1), the time period from June 6, 2005, through and including August 26, 2005, the date now scheduled for the filing of Pinales' motions to suppress. This continuance was requested by Pinales to allow him time to prepare his motions to suppress. As such, this continuance serves the interests of justice.

The United States, with the assent of the other named defendants, respectfully moves to exclude, in computing the time within which the trial of this matter shall commence under 18 U.S.C. §3161(c)(1), the time period from June 6, 2005, through and including July 27, 2005, the date of the next scheduled

status conference. This continuance was requested by defendants to allow them time to complete discovery, review the voluminous discovery already provided and to prepare their case. As such, this continuance serves the interests of justice.

For the foregoing reasons, exclusion of these time periods serves the interests of justice and is appropriate under 18 U.S.C. §3161(h)(8)(A).

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Maureen B. Hogan
Maureen B. Hogan
Assistant U.S. Attorney

Dated: June 15, 2005